

Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

MAR - 1 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. 02-7
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Vermont)

**APPLICATION BY VERIZON NEW ENGLAND
FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN VERMONT**

REPLY APPENDIX A

Reply Declaration of Paul A. Lacouture, Virginia P. Ruesterholz, and
Catherine T. Webster
(Competitive Checklist and Operations Support Systems)

and

Reply Declaration of V. Louise McCarren, Patrick A. Garzillo, and
Michael J. Anglin
(Pricing)

**APPLICATION BY VERIZON NEW ENGLAND
FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN VERMONT**

CC DOCKET NO. 02-7

REPLY APPENDIX A

TABLE OF CONTENTS

Reply Declarations

Tab	Declarant	Subject
A	Paul A. Lacouture, Virginia P. Ruesterholz, and Catherine T. Webster	Competitive Checklist and Operations Support Systems
B	V. Louise McCarren, Patrick A. Garzillo, and Michael J. Anglin	Pricing

A

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAR - 1 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Application by Verizon New England)	
Inc., Bell Atlantic Communications,)	
Inc. (d/b/a Verizon Long Distance),)	
NYNEX Long Distance Company)	CC Docket No. 02-7
(d/b/a Verizon Enterprise Solutions),)	
Verizon Global Networks Inc., and)	
Verizon Select Services Inc., for)	
Authorization To Provide In-Region,)	
InterLATA Services in Vermont)	

**REPLY DECLARATION OF PAUL A. LACOUTURE,
VIRGINIA P. RUESTERHOLZ
and
CATHERINE T. WEBSTER**

1. My name is Paul A. Lacouture. I submitted a Declaration with Virginia P. Ruesterholz in this proceeding on January 17, 2002. My qualifications are set forth in that Declaration. I am accountable for Sections I, II and III of our reply declaration.
2. My name is Virginia P. Ruesterholz. I submitted a Declaration with Paul A. Lacouture in this proceeding on January 17, 2002. My qualifications are set forth in that Declaration. I am accountable for Sections I, III and III of our reply declaration.
3. My name is Catherine T. Webster. My business address is 1095 Avenue of Americas, New York, New York, 10036. I am employed by Verizon Services Corp. as Vice President-Network Services Finance. My responsibilities include financial support for the Network Services Group in the Telecom Group. I am also responsible for

Wholesale Revenue Assurance, Billing, and Collection functions. I am accountable for Section IV of our reply declaration.

4. Prior to assuming my current responsibilities, I was Vice President-Financial Planning Analysis for the Telecom Group. My responsibilities included all budgeting, analysis and reporting of the various lines of business within the Telecom Group.

I. Purpose of Reply Declaration.

5. The purpose of our reply declaration is to provide updated performance data for several checklist items and to address the comments of CTC and DIRECTV and an issue included in the Vermont Public Service Board's ("Vermont PSB") comments. As we explained in our declaration, Verizon provides checklist items in Vermont using the same processes and procedures as Massachusetts. Therefore, the monthly performance measurement results for December 2001 and January 2002 for Vermont and Massachusetts are included in Reply App. B, Tabs 1 and 2, respectively. Reports showing performance trends over the period from June 2001 through January 2002 for Vermont and April 2001 through January 2002 for Massachusetts are included in Reply App. B, Tabs 3 and 4, respectively. Summary Measurements Reports for June 2001 through January 2002 for Vermont and April 2001 through January 2002 for Massachusetts are included in Reply App. B, Tabs 5 and 6, respectively. Finally, CLEC specific monthly performance measure results for December 2001 and January 2002 for Vermont are included in Reply App. B, Tab 7.

II. Verizon Provides Loops.

6. There is no dispute that Verizon's overall performance in providing unbundled loops is excellent. As we explained in our declaration, as of November 2001, Verizon has provisioned about 1,500 loops in Vermont. In December and January, Verizon provisioned more than 440 unbundled loops to CLECs in Vermont, including about 180 that were provided as part of an unbundled network element platform that also included switching and transport.

a. POTS Loops.

7. Verizon is continuing to deliver stand-alone CLEC POTS loops in Vermont when CLECs want them. As we explained in our declaration, during September, October and November 2001, Verizon provisioned only 9 CLEC stand-alone POTS loops orders, which is too few to produce meaningful performance results. Nonetheless, Verizon provisioned all 9 CLEC stand-alone POTS orders on time (PR-4-04-3113). During December 2001, Verizon provisioned 9 CLEC stand-alone POTS loop orders in Vermont and all of them were provisioned on time. During January 2002, Verizon provisioned 15 CLEC stand-alone POTS loop orders in Vermont and all but one of them were provisioned on time. *See Reply App. B, Tab 3 at 146.*

8. Verizon's performance in Massachusetts continues to be strong. As we explained in our declaration, during September, October and November 2001, Verizon missed about 1.65 percent of installation appointments in Massachusetts for CLEC stand-alone POTS loop orders that require a dispatch and 5.67 percent for the retail comparison group (PR-4-04-3113). During December 2001, Verizon's missed installation appointment rate was 0.66 percent for CLEC stand-alone POTS loops and 5.03 percent

for the retail comparison group. During January 2002, Verizon's missed installation appointment rate was 1.56 percent for CLEC stand-alone POTS loops and 5.07 percent for the retail comparison group. *See Attachment 1.* In other words, Verizon is installing over 98 percent of CLEC stand-alone POTS loops on time in Massachusetts.

9. Verizon is installing CLEC stand-alone POTS loops with a high degree of quality. During September, October and November 2001, Verizon's rate of installation trouble reports within 30 days (the "I-Code" rate) in Vermont was 0.56 percent for CLEC stand-alone POTS loops, compared with 2.30 percent for the retail comparison group (PR-6-01-3112). During December 2001, Verizon's I-Code rate in Vermont was 3.23 percent for CLEC stand-alone POTS loops, compared with 2.27 percent for the retail comparison group. During January 2002, Verizon's I-Code rate in Vermont was 0.93 percent for CLEC stand-alone POTS loops, compared with 1.87 percent for the retail comparison group. *See Attachment 2.*

10. Verizon's installation quality performance in Massachusetts also continues to be strong. As we explained in our declaration, during September, October and November 2001, 1.49 percent of CLEC stand-alone POTS loops in Massachusetts had troubles reported within 30 days, as compared to more than 3.52 percent for the retail comparison group (PR-6-01-3112). During December 2001, Verizon's I-Code rate in Massachusetts was 1.93 percent for CLEC stand-alone POTS loops, compared with 3.06 percent for the retail comparison group. During January 2002, Verizon's I-Code rate in Massachusetts was 2.01 percent for CLEC stand-alone POTS loops, compared with 2.66 percent for the retail comparison group. *See Attachment 3.*

11. Verizon's performance for repairing and maintaining CLEC stand-alone POTS loops is strong. As we explained in our declaration, during September, October and November 2001, fewer than one third of one percent of CLEC POTS loops in Vermont had reported troubles found in either the outside plant or the central office, compared to 0.83 percent for the retail comparison group (MR-2-02-3550 and MR-2-03-3550). During December 2001, 0.74 percent of CLEC stand-alone POTS loops in Vermont had reported troubles found in either the outside plant or the central office, compared to 0.72 percent for the retail comparison group. During January 2002, 0.33 percent of CLEC stand-alone POTS Loops in Vermont had troubles found in either the outside plant or the central office, as compared to 0.64 percent for the retail comparison group. *See Attachment 4.*

12. Verizon's performance in Massachusetts under these measures also continues to be strong. As we explained in our declaration, during September, October and November 2001, fewer than 0.60 percent of CLEC stand-alone POTS loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 1.08 percent for the retail comparison group (MR-2-02-3550 and MR-2-03-3550). During December 2001, 0.56 percent of CLEC stand-alone POTS loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.99 for the retail comparison group. During January 2002, 0.55 percent of CLEC stand-alone POTS loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.93 percent for the retail comparison group. *See Attachment 5.*

13. Another measure of Verizon's maintenance performance is the missed repair appointment rate. As we explained in our declaration, during September, October and November 2001, Verizon received a total of 4 CLEC trouble reports in Vermont for stand-alone POTS loops, which are too few to produce meaningful performance results. Nonetheless, Verizon did not miss any of these repair appointments for CLEC stand-alone POTS loops in Vermont (MR-3-01-3550 and MR-3-02-3550). During December 2001, Verizon received 4 CLEC trouble reports for stand-alone POTS loops and did not miss any of these repair appointments. During January 2002, Verizon received 2 CLEC trouble reports for stand-alone POTS loops and did not miss any of these repair appointments. *See Reply App. B, Tab 3 at 194.*

14. Verizon's performance in Massachusetts under this measure has continued to be strong. As we explained in our declaration, during September, October and November 2001, Verizon's average missed repair appointment rate in Massachusetts for CLEC stand-alone POTS loops was 3.83 percent and for the retail comparison group was 9.14 percent (MR-3-01-3550 and MR-3-02-3550). During December 2001, Verizon's average missed repair appointment rate for CLEC stand-alone POTS loops in Massachusetts was 4.89 percent and for the retail comparison group was 9.46 percent. During January 2002, Verizon's average missed repair appointment rate for CLEC stand-alone POTS loops in Massachusetts was 3.80 percent and for the retail comparison group was 8.28 percent. *See Attachment 6.* This means that Verizon is meeting over 95 percent of repair appointments for CLEC stand-alone POTS loops in Massachusetts.

15. Verizon's mean time to repair CLEC stand-alone POTS loops in Vermont continues to be in parity, although Verizon had too few trouble reports to produce

meaningful performance results. As we explained in our declaration, during September, October and November 2001, Verizon's mean time to repair for the 4 CLEC stand-alone POTS loops in Vermont was, on average, 5.50 hours for CLECs and 16.64 hours for the retail comparison group (MR-4-01-3550). During December 2001, Verizon's mean time to repair 4 CLEC stand-alone POTS loops in Vermont was 5.20 hours for CLECs and 18.60 hours for the retail comparison group. During January 2002, Verizon's mean time to repair CLEC stand-alone POTS loops in Vermont was 2.91 hours for CLECs and 16.74 hours for the retail comparison group. *See Reply App. B, Tab 3 at 196.*

16. Verizon's mean time to repair CLEC stand-alone POTS loops in Massachusetts continues to be in parity. As we explained in our declaration, during September, October and November 2001, Verizon's mean time to repair CLEC stand-alone POTS loops was, on average, 13.73 hours in Massachusetts and 19.17 hours for Verizon's retail customers (MR-4-01-3550). During December 2001, Verizon's mean time to repair CLEC stand-alone POTS loops in Massachusetts was 13.62 hours and 18.31 hours for the retail comparison group. During January 2002, Verizon's mean time to repair CLEC stand-alone POTS loops in Massachusetts was 13.18 hours and 16.74 hours for the retail comparison group. *See Reply App. B, Tab 4 at 199.*

17. As we explained in our declaration, Verizon's repeat trouble report rates for CLEC stand-alone POTS loops (MR-5-01-3550) in Vermont, when calculated under the new guidelines adopted by the New York Public Service Commission ("New York PSC") and the Vermont PSB¹ for this performance measure, are in parity. During

¹ Changes to the Guidelines adopted by the New York PSC are automatically adopted in Vermont. *Investigation into the Establishment of Wholesale Service Quality Standards for Providers of Telecommunications Services*, Docket No. 6255, Order

September, October and November 2001, Verizon had no repeat trouble reports in Vermont under the new business rules. During December 2001, Verizon had only one repeat trouble report for CLEC stand-alone POTS loops in Vermont. During January 2002, Verizon had no repeat trouble reports for CLEC stand-alone POTS in Vermont. *See Reply App. B, Tab 3 at 198.*

18. Verizon's repeat trouble report rate in Massachusetts is likewise in parity when calculated under the new guidelines adopted by the New York PSC for this performance measure. During September, October and November 2001, Verizon's repeat trouble report rate for CLEC stand-alone POTS loops in Massachusetts was 17.40 percent and 18.68 percent for the retail comparison group (MR-5-01-3550). During December 2001, Verizon's repeat trouble report rate for CLEC stand-alone POTS loops in Massachusetts under the new business rules was 16.50 percent and 18.93 percent for the retail comparison group, which are reported on the Carrier-to-Carrier Performance Report. During January 2002, Verizon's repeat trouble report rate for CLEC stand-alone POTS loops in Massachusetts under the new business rules was 17.79 percent and 17.67 percent for the retail comparison group, which are reported on the Carrier-to-Carrier Performance Report. *See Reply App. B, Tab 4 at 201.*

b. Hot Cut Loops.

19. In our declaration, we demonstrated that Verizon uses the same hot cut process in Vermont and Massachusetts and that its hot cut performance is excellent. During December 2001 and January 2002, Verizon is continuing to provide hot cuts in Vermont and Massachusetts with excellent performance.

Adopting Carrier to Carrier Standards, at 4-5 (VT PSB Dec. 12, 2001).

20. During September, October and November 2001, Verizon completed a total of only 30 hot cut orders, which are too few to provide meaningful performance results. Nonetheless, during this period, Verizon completed all of its hot cut orders in Vermont on time (PR-9-01-3520). During December 2001, Verizon completed 13 hot cut orders and all of them were on time. During January 2002, Verizon completed 27 hot cut orders in Vermont and all of them were on time. *See Reply App. B, Tab 3 at 153.*

21. During September, October and November 2001, Verizon completed, on average over 97.83 percent of its Massachusetts hot cut orders on time (PR-9-01-3520). During December 2001 and January 2002, Verizon's hot cut on time completion rate in Massachusetts was 98.8 percent and 99.3 percent, respectively. *See Attachment 7.*

22. Verizon's installation quality performance for hot cuts in Vermont is excellent. During September, October and November 2001, no CLEC hot cuts in Vermont had reported troubles within 7 days of installation (PR-6-02-3520). During December and January, no CLEC hot cuts in Vermont had reported troubles within 7 days of installation. *See Reply App. B, Tab 3 at 152.*

23. Verizon's installation quality performance for hot cuts in Massachusetts also continues to be strong. During September, October and November 2001, 0.39 percent of CLEC hot cuts in Massachusetts had reported troubles within 7 days of installation (PR-6-02-3520). During December 2001, 0.73 percent of CLEC hot cuts in Massachusetts had reported troubles within 7 days of installation. During January 2002, 0.49 percent of CLEC hot cuts in Massachusetts had reported troubles within 7 days of installation. *See Reply App. B, Tab 4 at 154.*

c. High Capacity Loops.

24. Verizon offers CLECs unbundled access to high capacity (DS-1 and DS-3) loops in Vermont in the same manner as in Massachusetts. As of November 2001, Verizon has provisioned about 14 high capacity DS-1 loops, and no high capacity DS-3 loops in Vermont.

25. As we explained in our declaration, Verizon is provisioning very few high capacity loops. During September, October and November 2001, Verizon provisioned only about 3 or fewer DS-1 loops per month in Vermont. With so few orders, Verizon's monthly reported performance is subject to significant variations. Nonetheless, Verizon's performance in provisioning high capacity DS-1 loops in Vermont is strong. During September, October and November 2001, Verizon did not miss any installation appointments in Vermont for high capacity DS-1 loops (PR-4-01-3211). During December 2001, Verizon provisioned 4 DS-1 loops in Vermont and met all installation appointments. During January 2002, Verizon provisioned 7 DS-1 loops in Vermont and met all but one installation appointment. *See Reply App. B, Tab 3 at 184.*

26. Verizon's on-time performance for high capacity DS-1 loops in Massachusetts is also strong. During September, October and November 2001, Verizon missed only 4.68 percent of high capacity DS-1 loop orders for CLECs in Massachusetts, as compared to 20.72 percent for the retail comparison group (PR-4-01-3211). During December 2001, Verizon missed only 1.94 percent of high capacity DS-1 loop orders for CLECs in Massachusetts, as compared to 11.61 percent for the retail comparison group. During January 2002, Verizon missed only 1.56 percent of high capacity DS-1 loop orders for CLECs in Massachusetts, as compared to 15.68 percent for the retail

comparison group. *See* Reply App. B, Tab 4 at 187. This means that Verizon is installing over 95 percent of CLEC high capacity loops on time in Massachusetts and that its performance is improving.

27. Because Verizon has provided a relatively small number of high capacity loops in Vermont, it has continued to receive a very limited number of installation trouble reports. As we explained in our declaration, although Verizon's installation quality in Vermont is not reported separately for DS-1 loops, Verizon had received only 3 installation trouble reported for high capacity loops, loop/transport combination and interoffice facilities during September, October and November (PR-6-01-3200). During December 2001, Verizon received only one installation trouble report for high capacity loops, loop/transport combinations and interoffice facilities. During January 2002, Verizon received no installation trouble reports for high capacity loops, loop/transport combinations and interoffice facilities. *See* Reply App. B, Tab 3 at 188.

28. Finally, Verizon is maintaining high capacity loops on a non-discriminatory basis. As we explained in our declaration, during September, October and November 2001, the trouble report rate in Vermont on high capacity loops, loop/transport combinations and interoffice facilities provided to CLECs and the retail comparison group was less than two percent (MR-2-01-3200). During December and January, the trouble report rate in Vermont on high capacity loops, loop/transport combinations and interoffice facilities was again less than two percent. *See* Reply App. B, Tab 3 at 229.

29. Verizon's performance in maintaining high capacity loops in Massachusetts also continues to be strong. As we explained in our declaration, during September, October and November 2001, the trouble report rate in Massachusetts on high

capacity loops, loop/transport combinations and interoffice facilities provided to CLECs and the retail comparison group was less than two percent (MR-2-01-3200). During December and January, the trouble report rate in Massachusetts on high capacity loops, loop/transport combinations and interoffice facilities was less than two percent. *See* Reply App. B, Tab 4 at 232.

d. DSL Loops.

30. As we demonstrated in our declaration, Verizon is more than capable of providing commercial volumes of DSL loops. Through January 2002, Verizon has provided about 250 DSL loops in Vermont.

31. In addition, we demonstrated that Verizon satisfied all checklist requirements for DSL loops. During December 2001 and January 2002, Verizon's DSL loop performance continues to be excellent.

32. Verizon is continuing to provision DSL loops when CLECs want them. As we explained in our declaration, during September, October and November 2001, Verizon did not miss any installation appointments on DSL loop dispatch orders for CLECs in Vermont (PR-4-04-3342). During December and January, Verizon did not miss any installation appointments on dispatch orders for CLECs in Vermont. *See* Reply App. B, Tab 3 at 164. This means that Verizon is installing 100 percent of CLEC DSL loop orders on time in Vermont.

33. Verizon's performance in provisioning DSL loops in Massachusetts also continues to be excellent. During September, October and November 2001, the missed installation appointment rate on DSL loop dispatch orders for CLECs in Massachusetts was 0.63 percent (PR-4-04-3342). During December 2001, Verizon's missed installation

appointment rate on DSL loop dispatch orders for CLECs in Massachusetts was 0.53 percent. During January 2002, Verizon did not miss any installation appointments on DSL loop dispatch orders for CLECs in Massachusetts. *See* Attachment 8. This means that Verizon is installing over 99 percent of DSL loop orders on time in Massachusetts.

34. One provisioning measure that the Commission has not relied on in prior applications is PR-3-10-3342, which shows the percentage of DSL loop orders (1-5 lines) completed within 6 days. Although there is no reason for the Commission to consider this measure, Verizon's performance under this measure is excellent. During September, October and November 2001, Verizon reported only 21 orders under this measure, which is too few to provide meaningful performance results. Nonetheless, Verizon's rate for completing orders for DSL loops within 6 days in Vermont was 95.24 percent. During December and January, there were no observations under this measure in Vermont. *See* Reply App. B, Tab 3 at 163.

35. In addition, Verizon reports the results for PR-3-11-3342 (percent completed within 9 days), which includes orders where a CLEC requested a manual loop qualification. Although there is no reason for the Commission to consider this measure, Verizon's performance under this measure is excellent. During September, October and November 2001, the results for CLECs in Vermont were, on average, 98.99 percent. During December and January, Verizon completed 100 percent of CLEC DSL loop orders in Vermont within 9 days. *See* Reply App. B, Tab 3 at 163.

36. Verizon is also providing unbundled DSL loops to CLECs with a high level of quality. As we explained in our declaration, the New York PSC recently revised the installation quality measure in two ways. First, installation quality for DSL loops will

be compared to retail dispatched POTS orders. Second, installation troubles within 30 days for *all* CLECs will be counted – not just those who test cooperatively with Verizon. Verizon's installation quality performance calculated according to the guidelines recently adopted by the New York PSC and the Vermont PSB is in parity. During September, October and November 2001, the I-Code rate on DSL loops provided to all CLECs in Vermont was 1.94 percent, compared to 3.58 percent for the retail comparison group of dispatched POTS service (PR-6-01-3342). During December 2001, the I-Code rate on DSL loops provided to all CLECs in Vermont was 0.00 percent, compared to 4.16 percent for the retail comparison group of dispatched POTS service. During January 2002, the I-Code rate on DSL loops provided to all CLECs in Vermont was 3.85 percent, compared to 3.74 percent for the retail comparison group of dispatched POTS service. *See Attachment 9.*

37. Verizon's performance in Massachusetts continues to be excellent as calculated under the new business rules. During September, October and November 2001, the I-Code rate on DSL loops provided to all CLECs in Massachusetts was in parity with the retail comparison group (PR-6-01-3342). During December 2001, the I-Code rate on DSL loops provided to all CLECs in Massachusetts improved to 5.15 percent, compared to 6.05 percent for the retail comparison group. During January 2002, the I-Code rate on DSL loops provided to all CLECs in Massachusetts further improved to 3.81 percent, compared to 5.59 percent for the retail comparison group, which are reported on the January 2002 Carrier-to-Carrier Performance Report. *See Reply App. B, Tab 4 at 169.*

38. Verizon's performance in maintaining and repairing CLEC DSL loops is also excellent. One measure of Verizon's maintenance performance is the network trouble report rate. During September, October and November 2001, 0.42 percent of CLEC DSL loops in Vermont had reported troubles found in either the outside plant or the central office, compared to 0.83 percent for the retail comparison group (retail POTS service) recently established by the New York PSC and the Vermont PSB (MR-2-02-3342 and MR-2-03-3342). During December 2001, 0.70 percent of CLEC DSL loops in Vermont had reported troubles found in either the outside plant or the central office, compared to 0.72 percent for the new retail comparison group. During January 2002, 0.32 percent of CLEC DSL loops in Vermont had reported troubles found in either the outside plant or the central office, compared to 0.64 percent for the new retail comparison group. *See Attachment 10.*

39. Verizon's network trouble report rate also continues to be strong in Massachusetts. During September, October and November 2001, fewer than one percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 1.07 percent for the retail comparison group (retail POTS service) recently established by the New York PSC (MR-2-02-3342 and MR-2-03-3342). During December 2001, 0.46 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.98 percent for the new retail comparison group. During January 2002, 0.71 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.92 percent for the new retail comparison group. *See Reply App. B, Tab 4 at 215.*

40. Another measure of Verizon's performance is the percentage of repair appointments for DSL loops that Verizon fails to meet. As we demonstrated in our declaration, during September, October and November 2001, Verizon received a total of 5 trouble reports for CLEC DSL loops in Vermont and met all repair appointments. During December and January, Verizon received a total of 4 trouble reports for CLEC DSL loops in Vermont and met all repair appointments (MR-3-01-3342 and MR-3-02-3342). *See* Reply App. B, Tab 3 at 213.

41. Verizon's performance under this measure in Massachusetts continues to be excellent. During September, October and November 2001, Verizon met 91.84 percent of repair appointments for CLECs in Massachusetts, compared to 90.91 percent for the retail comparison group (MR-3-01-3342 and MR-3-02-3342). During December 2001, Verizon met 94.11 percent of repair appointments for DSL loops in Massachusetts, compared to 90.46 percent for the retail comparison group. During January 2002, Verizon met 94.69 percent of repair appointments for DSL loops in Massachusetts, compared to 91.54 percent for the retail comparison group. *See* Attachment 11. This means that Verizon met more than 91 percent of repair appointments for DSL loops in Massachusetts over this five-month period.

42. A third measure of Verizon's maintenance performance is the comparative time to complete repairs. During September, October and November 2001, Verizon's mean time to repair a trouble outside the central office in Vermont was 2.25 hours for CLECs, compared to 17.71 hours for the retail comparison group (MR-4-02-3342). During this same period, Verizon's mean time to repair a trouble in the central office in Vermont was 1.60 hours for CLECs, compared to 6.25 hours for the retail comparison

group (MR-4-03-3342). During December 2001, Verizon's mean time to repair a single trouble outside the central office in Vermont was 0.02 hours for CLECs, compared to 19.59 hours for the retail comparison group. Also during December 2001, Verizon's mean time to repair a single trouble in the central office in Vermont was 1.82 hours for CLECs, compared to 4.75 hours for the retail comparison group. During January 2002, Verizon's mean time to repair two troubles outside the central office in Vermont was 4.55 hours for CLECs, compared to 17.94 hours for the retail comparison group. Also during January 2002, Verizon did not need to repair any CLEC DSL loop troubles in the central office in Vermont. *See Reply App. B, Tab 3 at 215.*

43. Verizon's Massachusetts performance under this measure also continues to be excellent. During September, October and November 2001, Verizon's mean time to repair a trouble outside the central office was 18.76 hours for CLECs, compared to 18.06 hours for the retail comparison group (MR-4-02-3342). During this same period, Verizon's mean time to repair a trouble in the central office was 8.46 hours for CLECs, compared to 10.67 hours for the retail comparison group (MR-4-03-3342). During December 2001, Verizon's mean time to repair a trouble outside the central office in Massachusetts was 14.87 hours for CLECs, compared to 19.08 hours for the retail comparison group. Also during December 2001, Verizon's mean time to repair a trouble in the central office in Massachusetts was 3.71 hours for CLECs, compared to 10.15 hours for the retail comparison group. During January 2002, Verizon's mean time to repair a trouble outside the central office in Massachusetts was 12.70 hours for CLECs, compared to 17.67 hours for the retail comparison group. Also during January 2002, Verizon's mean time to repair a trouble in the central office in Massachusetts was 3.53

hours for CLECs, compared to 8.69 hours for the retail comparison group. *See* Attachment 12.

44. Finally, Verizon had only 9 trouble reports on CLEC DSL loops during September through January (MR-5-01-3342), which are too few to produce meaningful performance results under the repeat trouble report rate. Verizon's repeat trouble rates in Massachusetts are in parity during the months of September, October, November, December, and January. *See* Attachment 13.

e. 2-Wire Digital Loops.

45. CLECs typically order 2-Wire digital loops in those situations where a DSL loop is not available. The volume of 2-Wire digital loops provided by Verizon has steadily declined. In January 2002, for example, Verizon did not provision any 2-Wire digital loops in Vermont and only provisioned about 60 2-Wire digital loops in Massachusetts.

46. Verizon's performance in providing 2-Wire Digital loops is very good. During September, October, November, December and January, Verizon provisioned a total of only two 2-Wire digital loop orders in Vermont, which is too few to provide meaningful performance results. Nonetheless, Verizon installed both of these 2-Wire digital loop orders on time (PR-4-04-3341). *See* Reply App. B, Tab 3 at 158.

47. Verizon's performance in provisioning 2-Wire digital loops in Massachusetts continues to be excellent. During September, October, November, December and January, Verizon missed installation appointment rate on 2-Wire digital loops where a dispatch was required was 0.22 percent, as compared to 8.06 percent for the retail comparison group (PR-4-04-3341). *See* Attachment 14.

48. As explained in our declaration, Verizon no longer reports the average completed interval measure in either Vermont or Massachusetts.

49. Verizon is providing unbundled 2-Wire digital loops to CLECs with a high level of quality. One subset of total trouble reports – those reported within 30 days of installation (so-called “I-Codes”) – are included in the Carrier-to-Carrier Performance Reports as Percent Installation Troubles Reported within 30 days (PR-6-01-3341). The I-Code rate was originally intended to measure how often Verizon delivers 2-Wire digital loops that work, but it does not serve that purpose. It is the CLEC – not Verizon – that tests the 2-Wire digital loop and determines whether it is working at the time of installation. When Verizon installs a 2-Wire digital loop, Verizon contacts the CLEC so that the CLEC can test the 2-Wire digital loop. The CLECs, however, may not be able to test the loop until they have installed electronics at the customer premises and fully provisioned the customer’s service. As a result, the I-Code rate effectively serves as a measure of the CLECs’ ability to perform acceptance testing at the time Verizon installs the 2-Wire digital loop.

50. By contrast, the retail comparison group includes Verizon’s retail ISDN service, which Verizon can easily test at the time of installation. Verizon’s retail ISDN service includes voice service so that Verizon’s technician can call the customer to verify that the service is working. In addition, when Verizon installs its retail ISDN service, it can test that service using its central office testing equipment.

51. Because the reported installation quality measure for 2-Wire digital loops (PR-6-01-3341) is skewed by factors that are beyond Verizon’s control, it is not a meaningful measure. As explained above, September, October, November, December

and January, Verizon provisioned only two 2-Wire digital loops in Vermont, which is too few to provide meaningful performance results. Nonetheless, Verizon did not have any installation troubles reported within 30 days during this period (PR-6-01-3341). *See* Reply App. B, Tab 3 at 160. In Massachusetts, Verizon had only 9 installation troubles reported within 30 days during December and only 10 installation troubles reported during January. *See* Reply App. B, Tab 4 at 162.

52. Verizon's performance in maintaining and repairing CLEC 2-Wire digital loops is also excellent. One measure of Verizon's maintenance performance is the network trouble report rate. During September, October, November, December and January, Verizon had 6 or fewer 2-Wire digital loops in service in Vermont, which is too few to provide meaningful performance results. Nonetheless, Verizon did not have any network trouble reports on CLEC 2-Wire digital loops during that period (MR-2-02-3341 and MR-2-03-3341). *See* Reply App. B, Tab 3 at 206.

53. Verizon's network trouble report rate also continues to be strong in Massachusetts. During September, October, November, December and January, fewer than two percent of CLEC 2-Wire digital loops in Massachusetts had reported troubles found in either the outside plant or the central office (MR-2-02-3341 and MR-2-03-3341). *See* Reply App. B, Tab 4 at 209.

54. Another measure of Verizon's performance is the percentage of repair appointments for 2-Wire digital loops that Verizon fails to meet. During September, October, November, December and January, Verizon did not have any trouble reports on 2-Wire digital loops in Vermont (MR-3-01-3341 and MR-3-02-3341). *See* Reply App. B, Tab 3 at 207.

55. Verizon's performance under this measure in Massachusetts continues to be excellent. During September, October, November, December and January, Verizon met 92.78 percent of repair appointments for CLECs in Massachusetts, compared to 90.86 percent for the retail comparison group (MR-3-01-3341 and MR-3-02-3341). *See* Attachment 15.

56. A third measure of Verizon's maintenance performance is the comparative time to complete repairs. As explained above, during September, October, November, December and January, Verizon did not have any trouble reports for 2-Wire digital loops in Vermont (MR-4-01-3341). *See* Reply App. B, Tab 3 at 209.

57. Verizon's Massachusetts performance under this measure also continues to be excellent. During September, October, November, December and January, Verizon's mean time to repair a trouble in or outside the central office was 14.62 hours for CLECs, compared to 17.54 hours for the retail comparison group (MR-4-01-3341). *See* Reply App. B, Tab 4 at 212.

58. Finally, during September, October, November, December and January, Verizon did not have any repeat trouble reports in Vermont (MR-5-01-3341). *See* Reply App. B, Tab 3 at 211. During this same period, Verizon's repeat trouble rates in Massachusetts were in parity for all but one month (MR-5-01-3341). *See* Reply App. B, Tab 4 at 214.

f. Line Sharing.

59. As we demonstrated in our initial declaration, Verizon's overall line sharing performance has been excellent. Verizon's line sharing performance continues to be strong in December 2001 and January 2002. Although Verizon has received only 3